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**VIA EMAIL AND ECF**

Special Master Thomas P. Scrivo, Esq.  
O'Toole Scrivo, LLC  
14 Village Park Road  
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**RE: *Occidental Chemical Corp. v. 21st Century Fox America, Inc., et al.***  
**Docket No. 2:18-cv-11273-MCA-LDW**

Dear Special Master Scrivo:

The Small Parties Group (the "SPG") submits this motion to stay the Special Master's order and decision denying the SPG's motion for a protective order related to certain requests for production of documents, ECF Nos. 2080, 2081, and order and decision on the SPG's motion for reconsideration of the same, ECF Nos. 2188, 2189. When the SPG initially sought reconsideration of the Special Master's decision it filed a corresponding motion to stay, noting inter alia that compliance with the decision would require a significant effort by a large number of parties to produce documents that, until this dispute, all parties had regarded and treated as privileged and outside of the scope of searching and logging requirements. (ECF No. 2090.) The Special Master granted the motion to stay, ruling that SPG Defendants would not be required to produce documents responsive to the challenged requests pending the Special Master's decision on the SPG's motion for reconsideration. (ECF No. 2099.)

The SPG now appeals the Special Master's decision and order denying the motion for a protective order, and the motion for reconsideration of the same, to the District Court. For the reasons discussed in the SPG's earlier motion to stay, the SPG respectfully requests that the Special Master stay any obligation to comply with these decisions (ECF Nos. 2080, 2081, 2188, 2189) pending a decision by the District Court on the SPG's appeal.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "J. Talbert", written over a light blue circular stamp.

Jeffrey D. Talbert

cc: All counsel of record